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### IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

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2013 MAR 20 PM 3: 33

OLERICUS, DISTRICT COURT WESTERN DISTRICT OF TEXAS

UNITED STATES OF AMERICA,

Plaintiff,

VS.

IVAN GONZALES, (1),

AND

ASHLEY NICOLE GONZALES, (2),

Defendants.

CRIMINAL NO

SA13CR023

[Violation: 18 U.S.C. §§ 1951(a) & 2, Sex Trafficking of Children & Aiding and

Abetting.]

THE GRAND JURY CHARGES:

# **COUNT ONE**

[18 U.S.C. §§ 1951(a) & 2]

That on or about the 21<sup>st</sup> day of December, 2012, within the Western District of Texas, the Defendants,

### IVAN GONZALES,

#### **AND**

## ASHLEY NICOLE GONZALES,

each aiding and abetting the other, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain, by any means a person, that is B.S., knowing, and in reckless disregard of the fact, that B.S. had not attained the age of 18 years and would be caused to engage in a commercial sex act, in violation of Title 18,

# Case 5:13-cr-00233-XR Document 3 Filed 03/20/13 Page 2 of 2

United States Code, Sections 1951(a), 1951(b)(2) and Title 18, United States Code, Section 2.

A TRUE BILL.

FOREPERSON OF THE GRAND JURY

ROBERT PITMAN . UNITED STATES ATTORNEY

BY:

BETTINA J. RICHARDSON